

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROBIN JOACHIM DARTELL, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiffs,

vs.

TIBET PHARMACEUTICALS, INC, et al.

Defendants.

CASE No.: 14-CV-3620-JMV-JBC

**CHALLENGED PLAINTIFFS’
MOTION TO STRIKE THE
AFFIDAVIT OF MING ZHU,
MANAGER OF RMCC
INVESTMENTS, LLC**

MOTION DATE: October 16, 2017

Class Representatives Obasi Investment Limited, Robin Dartell, and Lixin Wu (collectively, the “Challenged Plaintiffs”), respectfully move this Court for an Order striking the Affidavit of Ming Zhu, Manager of RMCC Investments, LLC, (Doc. No. 286-2), which was filed in support of, and relied upon by, Defendants L. McCarthy Downs III’s and Hayden Zou’s Joint Memorandum to Dismiss Certain of the Lead Plaintiffs for Lack of Standing, (Doc. No. 286-1).

In support of this Motion, the Challenged Plaintiffs’ submit a Memorandum of Law dated September 18, 2017.

Dated: September 18, 2017

Respectfully submitted,

/s/ Laurence Rosen

Laurence Rosen, Esq. (LR-5733)

THE ROSEN LAW FIRM, P.A.

609 W. South Orange Avenue, Suite 2P

South Orange, NJ 07079

Tel: (973) 313-1887

Fax: (973) 833-0399

Email: lrosen@rosenlegal.com

Sara Fuks, Esq. (*pro hac vice*)

275 Madison Avenue, 34th Floor
New York, New York 10016
Telephone: (212) 686-1060
Facsimile: (212) 202-3827
Email: sfuks@rosenlegal.com

Lead Counsel for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September 2017, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence Rosen